

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, et al.,

Plaintiffs,

v.

JASON KESSLER, et al.,

Defendants.

No. 3:17-cv-00072-NKM

JURY TRIAL DEMANDED

**DEFENDANT JEFF SCHOEP AND NATIONAL SOCIALIST MOVEMENT'S
PRETRIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(3)**

Comes now, Defendants Jeff Schoep and National Socialist Movement (NSM), by and through counsel, respectfully submits the following disclosures pursuant to Federal Rule of Civil Procedure 26(a)(3) and to the Amended Pretrial Order entered and filed by this Court on July 15, 2021, ECF 991.

Defendants Schoep and NSM may call any or all of the following witnesses:

Witnesses to be called by Defendants Schoep and NSM:

1. Defendant Jeff Schoep
2. Mr. Rick Eaton,
Director of Research and Co-Director of Digital Terrorism and Hate Project
Simon Wiesenthal Center (SWC)
1399 S Roxbury Dr,
Los Angeles, CA 90035

Rick Eaton is a leading expert on both domestic and international extremist groups and online hate and terrorism. The SWC closely monitored Defendant Schoep's role in the NSM as well as Defendant NSM's activities for the past 25+ years. Mr. Eaton is an expert witness to the activities of the defendants and how they operated.

3. Deeyah Khan
4. Brian Culpepper
5. Any witness on plaintiffs' or any co-defendant's witness list that has not been otherwise objected to by defense counsel.
6. Any witnesses necessary for rebuttal or impeachment purposes.

Defendants reserve the right to supplement or revise these disclosures, prior to the time of trial.

Respectfully submitted September 7, 2021.

/s/ W. Edward ReBrook, IV

W. Edward ReBrook, IV, Esq. (VBA # Bar 84719)
The ReBrook Law Office
6013 Clerkenwell Court
Burke, Virginia 22015
(571) 215-9006 (phone)
edward@rebrooklaw.com

*Counsel for Defendants Jeff Schoep, National
Socialist Movement, Nationalist Front, David
Matthew Parrott, Matthew Heimbach, and
Traditionalist Worker Party*

CERTIFICATE OF SERVICE

I hereby certify that on September 7, 2021, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to all counsel of record in the case, as well as all ECF-registered *pro se* parties.

I hereby further certify that on September 7, 2021, I served a copy of the foregoing on the following non-ECF *pro se* parties, via electronic mail, as follows:

Richard Spencer
richardbspencer@icloud.com
richardbspencer@gmail.com

Robert "Azzmador" Ray
azzmador@gmail.com

Vanguard America
c/o Dillon Hopper
dillon_hopper@protonmail.com

Elliott Kline a/k/a Eli Mosley
eli.f.mosley@gmail.com
deplorabletruth@gmail.com
eli.r.kline@gmail.com

I hereby further certify that on September 7, 2021, I served a copy of the foregoing on the following non-ECF *pro se* party, via first-class mail, as follows:

Christopher Cantwell (00991-509)
USP Marion
U.S. Penitentiary
P.O. Box 1000
Marion, IL 62959

/s/ W. Edward Rebrook, IV

W. Edward ReBrook, IV, Esq. (VBA #84719)
The ReBrook Law Office
6013 Clerkenwell Court
Burke, Virginia 22015
(571) 215-9006 (phone)
edward@rebrooklaw.com

Counsel for Defendants Jeff Schoep,

*National Socialist Movement,
Nationalist Front, David Matthew
Parrott, Matthew Heimbach, and
Traditionalist Worker Party*